

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)
)
 v.) Case No. 1:21-cr-00245-AJT
)
 IGOR Y. DANCHENKO,)
)
 Defendant.)

**DEFENDANT IGOR DANCHENKO'S OBJECTIONS TO THE GOVERNMENT'S
PROPOSED TIRAL EXHIBITS**

Defendant Igor Danchenko, by and through counsel, respectfully submits his objections to the Special Counsel's proposed trial exhibits. Many of the proposed exhibits relate to issues currently being litigated through the government's motions *in limine* and may be resolved partly, or entirely, by the Court's ruling on Mr. Danchenko's pending motion to dismiss the indictment. In support of his objections, Mr. Danchenko provides the following:

Exhibit No.	Description	Objection
	FBI Records	
100	2017-01-24 INTERVIEW REPORT OF IGOR DANCHENKO	No objection if used to refresh or impeach.
101	2017-05-18 CONTACT REPORT SUBSTITUTION	Physical exhibit not provided.
102	2017-10-24 CONTACT REPORT SUBSTITUTION	Physical exhibit not provided.
103	2017-11-02 CONTACT REPORT SUBSTITUTION	Physical exhibit not provided.
104	ANDERSON, AMY LYNC CHATS	Physical exhibit not provided.
105	AUTEN, BRIAN LYNC CHATS	Physical exhibit not provided.
106	HELSON, KEVIN LYNC CHATS	Physical exhibit not provided.
107	HERTZOG, BRITTANY LYNC CHATS	Physical exhibit not provided.

108	COMPANY REPORT 080	No objection if foundation is laid through non-hearsay testimony and if not being offered for the truth of the matter asserted.
109	COMPANY REPORT 095	No objection if foundation is laid through non-hearsay testimony and if not being offered for the truth of the matter asserted.
110	COMPANY REPORT 097	No objection if foundation is laid through non-hearsay testimony and if not being offered for the truth of the matter asserted.
111	COMPANY REPORT 102	No objection if foundation is laid through non-hearsay testimony and if not being offered for the truth of the matter asserted.
112	COMPANY REPORT 105	No objection if foundation is laid through non-hearsay testimony and if not being offered for the truth of the matter asserted.
113	COMPANY REPORT 111	No objection if foundation is laid through non-hearsay testimony and if not being offered for the truth of the matter asserted.
114	2017-06-12 104500 EMAIL	No objection.
115	2017-01-24 INTERVIEW OF IGOR DANCHENKO 1A EXCERPT	No objection.
115T	2017-01-24 INTERVIEW OF IGOR DANCHENKO 1A EXCERPT TRANSCRIPT	No objection.
150	2017-03-16 RECORDING	No objection to use of recording but may raise relevance/cumulative and probative/prejudicial objections depending on how used.
152T	2017-03-16 RECORDING TRANSCRIPT	No objection to use of recording but may raise relevance/cumulative and probative/prejudicial objections depending on how used.
160	2017-05-18 RECORDING	No objection to use of recording but may raise relevance/cumulative and probative/prejudicial objections depending on how used.
160T	2017-05-18 RECORDING TRANSCRIPT	No objection to use of recording but may raise relevance/cumulative and probative/prejudicial objections depending on how used.
170	2017-06-15 RECORDING	No objection to use of recording but may raise relevance/cumulative and probative/prejudicial objections depending on how used.

170T	2017-06-15 RECORDING TRANSCRIPT	No objection to use of recording but may raise relevance/cumulative and probative/prejudicial objections depending on how used.
	Google Records	
200	2016-05-26 132800 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
200T	2016-05-26 132800 EMAIL TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
201	2016-05-26 170800 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
201T	2016-05-26 170800 EMAIL TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
202	2016-07-04 125537 EMAIL	Hearsay.
203	2016-07-14 044134 EMAIL	Hearsay.
204	2016-07-21 124700 EMAIL	No objection.
204T	2016-07-21 124700 TRANSLATION	No objection.
205	2016-07-26 093300 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
205T	2016-07-26 093300 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
206	2016-07-26 100600 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
206T	2016-07-26 100600 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
207	2016-08-18 123300 EMAIL	No objection.
207T	2016-08-18 123300 TRANSLATION	No objection.
208	2016-08-25 054526 EMAIL	Hearsay.
209	2020-07-17 174700 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
209T	2020-07-17 174700 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
210	2020-07-17 191200 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
210T	2020-07-17 191200 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
211	2020-07-17 203800 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
211T	2020-07-17 203800 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
212	2020-07-17 212800 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
212T	2020-07-17 212800 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.

213	2020-07-18 064600 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
213T	2020-07-18 064600 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
214	2020-07-18 115900 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
214T	2020-07-18 115900 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
215	2020-07-18 133400 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
215T	2020-07-18 133400 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
216	2020-07-19 012200 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
216T	2020-07-19 012200 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
217	2020-07-19 012600 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
217T	2020-07-19 012600 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
218	2020-07-19 013100 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
218T	2020-07-19 013100 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
219	2020-07-19 013600 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
219T	2020-07-19 013600 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
220	2020-07-19 054100 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
220T	2020-07-19 054100 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
221	2020-07-19 131900 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
221T	2020-07-19 131900 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
222	2020-07-19 134300 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
222T	2020-07-19 134300 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
223	2020-07-19 152100 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
223T	2020-07-19 152100 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
224	2020-07-19 153900 EMAIL	Sixth Amendment Confrontation Clause and hearsay.

224T	2020-07-19 153900 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
225	2020-07-19 174700 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
225T	2020-07-19 174700 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
226	2020-07-19 175600 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
226T	2020-07-19 175600 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
227	2020-07-19 180000 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
227T	2020-07-19 180000 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
228	2020-07-19 182700 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
228T	2020-07-19 182700 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
229	2020-07-19 184100 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
229T	2020-07-19 184100 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
230	2020-07-19 203400 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
230T	2020-07-19 203400 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
231	2020-07-20 110900 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
231T	2020-07-20 110900 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
232	2020-07-20 114400 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
232T	2020-07-20 114400 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
233	2020-07-20 115100 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
233T	2020-07-20 115100 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
234	2020-07-20 115800 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
234T	2020-07-20 115800 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
235	2020-07-20 120900 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
235T	2020-07-20 120900 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.

236	2020-07-20 121100 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
236T	2020-07-20 121100 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
237	2020-07-20 121800 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
237T	2020-07-20 121800 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
238	2020-07-20 122000 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
238T	2020-07-20 122000 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
239	2020-07-20 122300 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
239T	2020-07-20 122300 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
240	2020-07-20 122900 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
240T	2020-07-20 122900 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
241	2020-07-23 033200 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
241T	2020-07-23 033200 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
242	2020-07-23 085000 EMAIL	Sixth Amendment Confrontation Clause and hearsay.
242T	2020-07-23 085000 TRANSLATION	Sixth Amendment Confrontation Clause and hearsay.
243	SUBSCRIBER INFORMATION 960279472681	Relevance/Hearsay/Authenticity.
244	SUBSCRIBER INFORMATION 281034364316	Relevance/Hearsay/Authenticity.
	Sprint Records (202-679-xxxx)	
300	2016-01 CALL DETAIL RECORDS	Relevance.
301	2016-02 CALL DETAIL RECORDS	Relevance.
302	2016-03 CALL DETAIL RECORDS	Relevance.
303	2016-04 CALL DETAIL RECORDS	Relevance.
304	2016-05 CALL DETAIL RECORDS	No objection.
305	2016-06 CALL DETAIL RECORDS	No objection.

306	2016-07 CALL DETAIL RECORDS	No objection.
307	2016-08 CALL DETAIL RECORDS	No objection.
308	2016-09 CALL DETAIL RECORDS	No objection.
309	2016-10 CALL DETAIL RECORDS	No objection.
310	2016-11 CALL DETAIL RECORDS	Relevance.
311	2016-12 CALL DETAIL RECORDS	Relevance.
312	2017-01 CALL DETAIL RECORDS	Relevance.
313	2017-02 CALL DETAIL RECORDS	Relevance.
314	2017-03 CALL DETAIL RECORDS	Relevance.
315	2017-04 CALL DETAIL RECORDS	Relevance.
316	2017-05 CALL DETAIL RECORDS	Relevance.
317	2017-06 CALL DETAIL RECORDS	Relevance.
318	SPRINT SUBSCRIBER INFO DANCHENKO	No objection.
319	SPRINT RECORDS CERTIFICATION	No objection but should not be necessary in light of expected stipulation.
	AT&T Records (202-445-xxxx)	
400	AT&T CERTIFICATION	No objection but should not be necessary in light of expected stipulation.
401	RECORDS KEY	No objection.
402	CALL DETAIL RECORDS MOBILITY 2017	Relevance. If the government can establish the relevance of any entries in the 2017 call records, only those portions of the proposed exhibit should be admitted as opposed to all 1,773 pages.
403	SUBSCRIBER RECORDS 2017	Relevance.
404	CALL DETAIL RECORDS INTERNATIONAL 2017	Relevance.
405	CALL DETAIL RECORDS WIRELINE 2017	Relevance. If the government can establish the relevance of any entries in the 2017 call records, only those portions of the proposed exhibit should be admitted as opposed to all 335 pages.
406	PAYMENT RECORDS 2017	Relevance.

407	CALL DETAIL RECORDS MOBILITY 2016	Relevance. If the government can establish the relevance of any entries in the 2016 call records, only those portions of the proposed exhibit should be admitted as opposed to all 655 pages.
408	SUBSCRIBER RECORDS 2016	Relevance.
409	CALL DETAIL RECORDS INTERNATIONAL 2016	Relevance.
410	CALL DETAIL RECORDS WIRELINE 2016	Physical exhibit not provided.
	Verizon Records (404-667-xxxx)	
500	BILLING RECORDS	Relevance. If the government can establish the relevance of any entries in the billing records, only those portions of the proposed exhibit should be admitted as opposed to all 129 pages.
501	ACCOUNT RECORDS	Relevance.
502	SUBSCRIBER RECORDS	Relevance.
503	ACCOUNT RECORDS	Relevance.
504	CERTIFICATION OF RECORDS	No objection but should not be necessary in light of expected stipulation if the underlying records are ruled to be relevant.
505	CERTIFICATION OF RECORDS	No objection but should not be necessary in light of expected stipulation if the underlying records are ruled to be relevant.
	Facebook Records	
600	571738146 RECORDS	No objection.
601	571738146 CERTIFICATE OF AUTHENTICITY	No objection but should not be necessary in light of expected stipulation.
602	2016-01-27 ENTRY	Relevance.
603	2016-03-22 ENTRY	Relevance.
604	2016-05-13 ENTRY	In Russian. Relevance.
604T	2016-05-13 ENTRY TRANSLATION	Relevance.
605	2016-06-14 ENTRY	In Russian. Relevance.
605T	2016-06-14 ENTRY TRANSLATION	Relevance.
606	2016-06-18 ENTRY	In Russian. Relevance.
606T	2016-06-18 ENTRY TRANSLATION	Relevance.
607	2016-07-28 ENTRY	No objection.
608	2016-09-18 ENTRY	Relevance.
609	2017-01-05 ENTRY	Relevance.
	KGlobal Records	
700	2016-03-08 164300 EMAIL	Relevance/Hearsay.

701	2016-03-10 200600 EMAIL	Relevance/Hearsay.
702	2016-04-29 203300 EMAIL	Relevance/Hearsay.
703	2016-04-29 204000 EMAIL	Relevance/Hearsay.
704	2016-04-29 212100 EMAIL	Relevance/Hearsay.
705	2016-04-30 101100 EMAIL	Relevance/Hearsay.
706	2016-04-30 175300 EMAIL	Relevance/Hearsay.
707	2016-05-21 142100 EMAIL	Relevance/Hearsay.
708	2016-05-31 175100 EMAIL	Relevance/Hearsay.
709	2016-06-10 164900 EMAIL	Relevance/Hearsay.
710	2016-06-14 080000 EMAIL	Relevance/Hearsay.
711	2016-07-22 225900 EMAIL	Relevance/Hearsay.
712	2016-08-19 200600 EMAIL	Relevance/Hearsay.
713	2016-08-20 124300 EMAIL	Relevance/Hearsay.
714	2016-08-20 140000 EMAIL	Relevance/Hearsay.
715	2016-09-22 104500 EMAIL	Relevance/Hearsay.
716	2016-11-07 141500 EMAIL	Relevance/Hearsay.
717	2017-01-13 111500 EMAIL	Relevance/Hearsay.
Marriott/Ritz Carlton Records		
800	2013-11-08 DUTY MANAGER REPORT	Relevance/Hearsay/Authenticity/Prejudicial.
801	2013-11-09 DUTY MANAGER REPORT	Relevance/Hearsay/Authenticity/Prejudicial.
802	2013-11-10 INVOICE	Relevance/Hearsay/Authenticity/Prejudicial.
803	2013-11-11 LOSS PREVENTION REPORT	Relevance/Hearsay/Authenticity/Prejudicial.
804	2013-11-20 125400 EMAIL	In Russian. No translation provided. Relevance/Hearsay/Authenticity/Prejudicial.
805	2016-06-14 031700 EMAIL	Relevance/Hearsay/Authenticity/Prejudicial.
806	2017-01-10 214400 EMAIL	Relevance/Hearsay/Authenticity/Prejudicial.
807	2017-01-11 013700 EMAIL	Relevance/Hearsay/Authenticity/Prejudicial.
808	2017-01-11 032000 EMAIL	Relevance/Hearsay/Authenticity/Prejudicial.
809	2017-01-11 062200 EMAIL	Relevance/Hearsay/Authenticity/Prejudicial.
810	2017-01-11 065100 EMAIL	Relevance/Hearsay/Authenticity/Prejudicial.
811	2017-01-11 100500 EMAIL	Relevance/Hearsay/Authenticity/Prejudicial.
812	2017-01-13 074300 EMAIL	Relevance/Hearsay/Authenticity/Prejudicial.
813	2017-01-13 075100 EMAIL	Relevance/Hearsay/Authenticity/Prejudicial.
814	INSIDE THE KREMLIN CONTACT SHEET	Relevance/Hearsay/Authenticity/Prejudicial.
815	RC MOSCOW DANCHENKO INVOICE	Relevance/Hearsay/Authenticity/Prejudicial.
816	RC MOSCOW DANCHENKO DOLAN & KUPKA RESERVATIONS	Relevance/Hearsay/Authenticity/Prejudicial.
817	RC MOSCOW DOLAN INVOICE	Relevance/Hearsay/Authenticity/Prejudicial.

818	RC MOSCOW TRUMP RECORDS	Relevance/Hearsay/Authenticity/Prejudicial.
819	RC MOSCOW TRUMP RECORDS	Relevance/Hearsay/Authenticity/Prejudicial.
	Sidar Global Records	
900	2016-02-24 214100 EMAIL	Relevance/Authenticity. If ruled relevant and authenticated, it should not be admitted without the accompanying attachment.
	Perkins Coie Records	
1000	PERKINS COIE FUSION GPS CONSULTING AGREEMENT	Relevance/Hearsay/Authenticity/Prejudicial.
1001	PERKINS COIE LEGAL REPRESENTATION LETTER	Relevance/Hearsay/Authenticity/Prejudicial.
	Gregg Hartley Records	
1100	2016-04-18 165414 EMAIL	Relevance/Authenticity.
	Public Records	
1200	2016-09-23 YAHOO NEWS ARTICLE	Relevance. Does not meet definition of a public record.
1201	2016-10-31 MOTHER JONES ARTICLE	Relevance. Does not meet definition of a public record.
1202	2017-01-10 BUZZFEED ARTICLE	Relevance. Does not meet definition of a public record.
1203	2016-08-19 POLITICO ARTICLE	Relevance. Does not meet definition of a public record.
	Amtrak Records	
1300	AMTRAK RECORDS	No objection.
1301	AMTRAK CERTIFICATION	No objection but should not be necessary in light of expected stipulation.
	Customs & Border Patrol Records	
1400	SERGEI MILLIAN TRAVEL RECORD	No objection.
	LinkedIn Records	
1500	DANCHENKO LINKEDIN MESSAGES	Relevance/Hearsay. The government has not identified which LinkedIn messages it seeks to introduce and Mr. Danchenko objects to admission of any messages not sent by Mr. Danchenko and objects to the inclusion of any messages not specifically admitted as evidence.
1501	LINKEDIN BUSINESS RECORD AFFIDAVIT	No objection but should not be necessary in light of expected stipulation.
	Summary Witness Records	
1600	SUMMARY 2016-05 - 2020-07 EMAIL TRANSLATIONS	Sixth Amendment Confrontation Clause and hearsay.

1601	SUMMARY 2016-07 - 2016-08 EMAIL TRANSLATIONS	No objection to the text of emails sent by Mr. Danchenko. Sixth Amendment Confrontation Clause and hearsay to all other emails.
1602/1605	SUMMARY DANCHENKO/DOLAN CALL DETAIL RECORDS	Relevance.
1603	SUMMARY DANCHENKO CALL DETAIL RECORDS	Physical exhibit not provided.
	Microsoft Records	
1700	DANCHENKO HOTMAIL CONTACTS RECORDS	Relevance.
1701	MICROSOFT CERTIFICATION	No objection but should not be necessary in light of expected stipulation.
1702	HOTMAIL SUBSCRIBER INFORMATION DANCHENKO	No objection.
1703	HOTMAIL CONTACT MILLIAN	No objection.

Dated: September 15, 2022

Respectfully submitted,

IGOR DANCHENKO
By Counsel

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2022, I electronically filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which will send automatic notice of such filing to all counsel for record.

/s/

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